

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In Re: SHANNON MAUREEN SMITH

Debtor.

Case No. 16-33837-rld13

OBJECTION TO CONFIRMATION AND MOTION TO  
DISMISS

The United States of America, a creditor herein, acting by and through its undersigned counsel, objects to confirmation of the debtors' plan and moves the court for an order dismissing this case, for the following reasons:

1. The Internal Revenue Service (IRS) has searched its records and found no record of the filing of certain returns, as follows:

Year/Period	Form/Type of Tax
2015	1040

2. All returns required for pre-petition periods must be filed prior to plan confirmation. The United States objects to confirmation of the plan until the required returns are filed, and for at least 30 days thereafter, so the IRS may properly determine the amount and status of any tax claims and whether the plan provides proper treatment. For filing, all returns should be sent to:

Internal Revenue Service  
M/S O240  
1220 SW Third Ave, Suite G-044  
Portland, Oregon 97204-2871

Dated: 11/08/2016

/s/ Kathleen L. Bickers  
KATHLEEN L. BICKERS, OSB # 85151  
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Assistant United States Attorney  
1000 SW 3rd Ave., Ste. 600  
Portland, Oregon 97204  
Tel. No. (503) 727-1060

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN THAT the hearing on the above objection and motion will be held at the confirmation hearing scheduled by the court.

Dated: 11/08/2016

/s/ Kathleen L. Bickers  
KATHLEEN L. BICKERS, OSB # 85151  
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing OBJECTION TO CONFIRMATION AND MOTION TO DISMISS was made on 11/08/2016, by mailing a true copy addressed to the following, except those designated as receiving ECF notice, who will be served electronically by ECF:

ODR Bkcy  
955 Center St NE  
Salem OR 97301-2555  
Creditor,

Harold T Gable, DMD  
POB 2379  
Gearhart OR 97138-2379

Creditor,

Jane B. Gable  
POB 2379  
Gearhart OR 97138-2379  
Creditor,

Mike Scott, Attorney for Creditor U.S. Bank Trust, N.A.  
Christopher N. Coyle, Attorney for Debtor  
Wayne Godare, Trustee  
US Trustee, Portland,

ECF Only  
ECF Only  
ECF Only  
ECF Only

Dated: 11/08/2016

/s/ Kathleen L. Bickers  
KATHLEEN L. BICKERS, OSB # 85151  
Assistant United States Attorney